

SUMMARY OF KEY EVENTS RELATING TO ESTABLISHMENT OF OPLs FOR NORLITE FACILITY

Distributed at June 25, 2019 Meeting with EPA

- 2004: Norlite conducted CPT to satisfy Part 373 (hazardous waste) and Subpart EEE (NESHAP) requirements
- 2008: DEC issued Part 373 hazardous waste permit containing alarm set points and WFCO limits based on 2004 CPT test results
- Maximum heat exchanger outlet temperature and minimum venturi scrubber pressure drop based directly on CPT results
 - Scrubber tank level and liquid to gas ratio not included in permit; OPLs for these parameters implemented as part of Norlite's day-to-day operations
 - Monthly WFCO Testing Parameter sheets included OPLs from 2004 CPT. Sheets available for review by DEC on-site monitor and other regulators.
 - Norlite submitted reports to DEC whenever it exceeded 25 or more AWFCOs during 30-day period. Reports based on 2004 CPT OPLs.
- 2008-2015: Operation of kiln (including air emissions) governed by Part 373 permit; Title V permit was under review and was neither accurate nor up-to-date
- 1/17/08: Biennial DEC air inspection
- 3/31/08: Biennial DEC RCRA incinerator inspection
- 7/16/09: DEC inspection
- 7/26/10: Biennial DEC air inspection
- 2/23/11: EPA inspection in response to odor complaint and evaluation of compliance with MACT standards
- 4/11: Report and NOC submitted to DEC for new CPT, including new potential OPLs
- Part 373 hazardous waste remained in effect, including OPLs based on 2004 CPT
 - DEC/EPA never specifically instructed Norlite to implement OPLs based on 2011 CPT in lieu of Part 373 OPLs
- 4/11: Tradebe purchased stock of Norlite. Continued to implement OPLs contained in Part 373 hazardous waste permit
- 6/27/12: Biennial DEC Title V air inspection. No problem with OPL selection identified.
- 12/6/12: Biennial DEC RCRA incinerator inspection. No problem with OPL selection identified.

- 9/24/14: Biennial DEC Title V air inspection (including regional and central office inspectors). No problem with OPL selection identified.
- 2015: CPT plan for 2015 test submitted to DEC included tables containing OPLs from 2008 Part 373 permit (which were based on 2004 CPT). No problem with OPLs listed identified by DEC or .
- 12/31/2015: DEC issued new hazardous waste permit that eliminated all OPLs; DEC also issued new Title V permit that incorporated OPLs from 2011 CPT/NOC.